ORDER

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

WESTERN-PACIFIC REGION

WP 8000.58

JUL 8 1992

SUBJ: FLIGHT STANDARDS DIVISION SAFETY ANALYSIS PROGRAM

1. PURPOSE. This order describes the individual programs that comprise the Western-Pacific Region Flight Standards Division Safety Analysis Branch, AWP-290. It defines policies and procedures applicable to the Technical Evaluation Program, and defines other programs within the Safety Analysis Branch.

2. DISTRIBUTION. This order is distributed to the Branch level in the Regional Flight Standards Division; to all Flight Standards District Offices and Certificate Management Offices; Flight Standards Service, AFS-1; and Evaluation and Analysis Branch, AFS-31.

3. CANCELLATION. Order WP 2150.1B, dated 07/19/85 is cancelled.

4. BACKGROUND. The Safety Analysis Branch, AWP-290, was established to consolidate the Flight Standards Division's safety analysis activities within a single organizational element. AWP-290 schedules and conducts regional inspections of air operators and air agencies; serves as a coordination focal point for National Aviation Safety Inspection Program (NASIP) activities; and administers airspace safety as well as other aviation safety programs.

5. OBJECTIVES.

a. The primary objective of AWP-290 is to support the Flight Standards Division by applying a systematic approach to the division's technical inspection, analysis, and evaluation capabilities.

b. Additional objectives are to provide managers with a detailed technical assessment of the status of Flight Standards programs; to determine the status of certificate holders within the region with respect to their compliance with Federal Aviation Regulations (FARs) and accepted safety standards; to determine the level and quality of service being provided to users; and to acknowledge and disseminate methods and procedures that are particularly effective and/or efficient.

Distribution: A-X(FS)-3; A-(FFS)-0(STD)
AFS-1(cy); AFS-11 (1cy)

Initiated By: AWP-290

6. SCOPE. AWP-290 embodies an overall safety analysis concept. It schedules and coordinates the conduct of regional and special inspections. It reviews and analyzes inspection and evaluation findings, database records, and other pertinent industry data for the purpose of identifying trends and formulating recommendations for improving the management, oversight, and safety of certificate holding entities within the region. It provides support to NASIP, and provides technical and administrative support for the division's automated programs including the Aviation Safety Analysis System (ASAS). It develops and coordinates airspace safety initiatives and activities within the boundaries of the Western-Pacific Region; assists in the development of aviation safety seminars, services, clinics, and/or workshops; and prepares the Flight Standards Division's quarterly Program Management Report. AWP-290 coordinates all Freedom Of Information Act (FOIA) requests relating to indepth NASIP and Regional Technical Evaluation Program Reports.

7 - 9 RESERVED.

10. PROGRAM RESPONSIBILITIES.

a. Airspace Safety Program Responsibilities.

(1) Develops, implements, and directs Flight Standards Division activities associated with improving the safety and efficiency of flight operations in Western-Pacific airspace with emphasis on congested, or terminal airspace.

(2) Participates in the analysis, design, and implementation of special types of controlled airspace (Terminal Control Areas, Airport Radar Surveillance Areas, temporary Restricted Areas, etc.) for the purpose of establishing optimum air traffic flow in terms of safety and efficiency.

(3) Analyzes pilot deviations involving airspace violations as well as near mid-air collision reports and other statistical data to identify operational or system trends requiring corrective action and develops recommendations aimed at preventing recurrences.

b. Technical Evaluation Program Responsibilities.

(1) Administers the annual call for inspection candidates. Selects ad-hoc inspection teams from inspector listings provided by field offices.

(2) Provides notification of inspections to field offices in accordance with time tables established by AWP-290. Schedules and coordinates NASIP activities, and /or Regional inspections of Air Operator and Air Agency certificate holders under the annual inspection plan.

(3) Coordinates special purpose, or "focused" inspections. Examples of situations that may trigger such inspections are:

(a) Air carrier accidents or incidents involving passenger injuries or fatalities.

(b) Air operators (including air carriers) or air agencies who are experiencing economic or financial difficulties.

(c) A high profile event such as a media investigative report focused on an FAA certificated air operator or air agency.

(d) When data base records indicate unsafe operating or maintenance trends.

(4) Analyzes inspection data to identify trends and common findings for the purpose of providing objective feedback.

(5) Publishes written reports from findings co. ed from ad-hoc inspection teams.

(6) Provides sufficient evidence and supporting data to field offices when inspection findings indicate that enforcement action is warranted.

c. Related Program Responsibilities.

(1) Collects program management data for the purpose of preparing for publication a quarterly summary of Flight Standards program activity.

(2) Converts the data collected into the most effective report format, showing individual field office progress, as well as regional office averages for overall program accomplishments.

(3) Coordinates audio visual program support activity.

(4) Coordinates international program support activity.

11- 19 RESERVED.

20. TECHNICAL EVALUATION PROGRAM POLICY AND GUIDANCE. The Western-Pacific technical evaluation program consists of periodic on-site inspections of air operators certificated under Parts 121, 125, 127, 133, 135, or 137; and of air agencies certificated under Parts 141, 145, or 147 of the FARs. These on-site inspections will be scheduled in advance, coordinated through AWP-290, and conducted by ad-hoc inspection teams assembled from inspectors selected from a list of candidates provided by Western-Pacific field offices.

a. Flight Standards Division Responsibilities. The Flight Standards Division, AWP-200, provides general technical and administrative guidance to AWP-290. It reviews and approves the Technical Evaluation Program's proposed annual inspection schedule.

b. Inspection Candidates (Definition). Means air operators and air agencies that because of trend indications, questionable operating practices, or other indicators identified by field offices or automated safety analysis systems, make likely candidates for NASIP or regional safety inspections.

c. Field Office Responsibilities With Respect To The Technical Evaluation Program.

(1) Participates in the annual "Call for Inspection Candidates." See appendix 1.

(2) Designates an inspector-coordinator to interface with the Technical Evaluation Program during an evaluation and inspection of a local certificate holder. The coordinator will arrange all meetings between the inspection team and the certificate holder. The coordinator will also provide notification of the inspection to the certificate holder.

(3) Provides documents and information to the Technical Evaluation Program to facilitate evaluation, inspection, and planning efforts, e.g., office/company manuals, operations specifications, environmental data, etc., as requested.

(4) Submits to AWP-290 progress reports and/or close out reports regarding findings of inspection discrepancies within 30 days after receipt of the technical evaluation report. Follow up reports will be submitted every 30 days until all inspection findings are satisfactorily resolved. The status reports shall include Enforcement Investigative Report (EIR) numbers assigned to findings that result in enforcement actions.

(5) Close out all inspection findings and/or inspection discrepancies within 120 days after receipt of the technical evaluation report. The close out reports shall address the corrective action taken by the certificate holder, and shall not include the certificate holder's comments or opinions.

(6) Responds to specific inquiries by the Technical Evaluation Program Manager regarding evaluation and inspection findings and related issues.

(7) If requested, prepares a report concerning the performance of the evaluation team.

d. Annual Call For Inspection Candidates.

(1) Under this plan, field offices will list the air operators and/or air agencies within their districts that, based on compliance history, financial difficulty, or surveillance trends and other field office concerns, make likely candidates for NASIP or regional inspections.

(2) Field offices should submit their list of inspection candidates to AWP-290 by September 1.

(3) AWP-290 will review Field Office input, AWP-250/260 input, trend monitoring information including automated safety analysis indicators, and then develop and prioritize annual inspection program.

(4) The proposed Regional Inspection Schedule will be submitted to AWP-200 for approval by September 15. After receiving approval, AWP-290 will assign ad-hoc inspection teams from inspector listings submitted by the field offices.

e. Inspection Plan. AWP-290 will plan each inspection of a certificate holder according to the following guidelines:

(1) Act as or appoint an inspection team leader.

(2) The team leader will request and review environmental data, maintenance or operations manuals, operations specifications, and lists of key company officials.

(3) The team leader will develop a document outlining travel, scheduling, and inspection plans. A copy of this plan will be provided to AWP-200 in advance of the on-site inspection.

(4) AWP-290 will notify the Certificate Holding District Office (CHDO), in writing at least 72 hours prior to beginning the on-site inspection.

(f) Inspection Procedures. Inspection teams will conduct inspections in accordance with the following guidelines:

(1) Brief key personnel in the CHDO on the inspection team's schedule and procedures.

(2) Brief the certificate holder's key personnel on the inspection team's schedule and procedures.

(3) Gather data in the following manner:

(a) Review operations specifications, operations or maintenance manuals, flight crew and aircraft records, and maintenance and inspection programs, as outlined in the inspection planning document, REF.e(3).

(b) Observe routine operations by conducting enroute inspections, ramp and spot inspections, and attending training sessions.

(c) Discuss procedures and programs with company employees.

(4) Advise appropriate CHDO personnel of significant findings as they become ıt.

(5) Immediately advise the AWP-290 Technical Evaluation Program Manager, as well as the CHDO manager, of issues relating to safety and/or critical noncompliance with FARs.

(6) Brief key CHDO personnel at the conclusion of the on-site inspection. (This is an informal exit briefing of all pertinent issues).

(g) Analyze Inspection Findings. After completion of the on-site inspection, and informal exit briefing, the Technical Evaluation Program Manager will analyze all data with the Inspection Team Leader. Each issue will be substantiated and validated before being classified as a finding. The inspection team will provide sufficient evidence to fully support all findings listed in the report.

(h) Report. The Technical Evaluation Program Manager will brief the Flight Standards Division Manager, AWP-200 on the contents of the final report. Copies of the final report will be provided to AWP-200 and AWP-290 in a format consistent with that required by NASIP.

(i) Formal Exit Briefing. The Technical Evaluation Program Manager and/or the Inspection Team Leader will conduct the following briefings.

(1) Brief key CHDO personnel on the contents of the final report.

(2) Brief the certificate holder's key personnel only after the report is finalized. Discuss findings of alleged noncompliance with FAR's as well as all other pertinent safety issues. Emphasize that all requests for corrective action will be in letter form, and that such requests will come from the CHDO.

(j) Corrective Action. Information derived from inspections and evaluations should be used to make improvements in flight standards programs. Managers should lead a process which results in corrective action being taken in response to all findings.

(k) Corrective Action Procedures. Corrective action will be taken, as follows:

(1) AWP-290 will distribute reports of national (NASIP) and regional program inspections under cover letter from AWP-200.

(2) Each field office manager will assign a person to act as the focal point for tracking finding closeouts, and to insure continuity of corrective action.

(3) Field offices will respond to each finding in writing, forwarding reports to AWP-290 within 30 days after receipt of the report.

(4) Field office managers will sign all corrective action or close out reports forwarded to AWP-290.

(5) AWP-290 will retain a record of all corrective actions on file until superseded. Findings with EIRs assigned should not be closed out with "administrative action" or "no action" resolutions until such close outs are coordinated with AWP-290, and the Operations or Airworthiness Branch as appropriate.

(6) AWP-290 will oversee the status of all open findings and report that status to AWP-200 at intervals as requested.

(7) The certificate holder will not be provided a copy of the final report unless it is requested from the CHDO. If the report is released by the CHDO as requested, the certificate holder will be advised in writing that the report will become releasable to the public under the Freedom of Information Act.

David C. Gilliom
Manager, Flight Standards Division

APPENDIX 1

SELECTION OF INSPECTION CANDIDATES

Measuring Safety Performance

Measurement of the performance quality of a certificate holder's safety related activities is made against the certificate holder's state of compliance with Federal Aviation Regulations (FARs). Compliance with FARs is taken to indicate that the certificate holder's operation is safe; noncompliance with FARs indicates that the certificate holder's operation may not be safe. This measurement standard only provides for basic evaluations of a certificate holder's compliance posture with published regulations. Because of the narrow measurement standard used, little information is gained when attempting to measure "levels" of safety related performance quality against FARs.

Operator Performance Monitoring

Measurement of the level of performance quality of a "compliant" certificate holder's safety related activities calls for the use of performance monitoring, techniques. For the purpose of the order, performance monitoring is a collection of professional observations and estimates[1] of performance quality, and the conversion of those estimates, over time, into identifiable trend patterns. Program Tracking and Reporting System (PTRS) surveillance reports that do not contain positive and/or negative comments are counterproductive to performance monitoring efforts.

When performance monitoring systems reveal that a certificate holder's level of safety only meets regulatory standards, then that certificate holder's operation, although "compliant," leaves no room for even the slightest down-scale variance in its performance. It is unrealistic to presume that a certificate holder can perform without both up-scale and down-scale performance variances over time. These performance variances typify normal operating parameters. Certificate holders whose level of safety performance, as revealed by performance monitoring, only follows that mandated by regulations make logical candidates for inspection by the Technical Evaluation Program. Conversely, those certificate holders whose level of safety performance consistently exceeds the minimum requirements of the FARs should not be considered as candidates for inspection by the Technical Evaluation Program.

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[1] *"Professional observations and estimates". An observation or estimate from a functional expert. Aviation Safety Inspectors are considered functional experts.*

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Other Factors

Additional factors that district offices should consider when nominating certificate holders for inspection candidates include:

(a) A major change in operating scope, such as significant route expansion, fleet expansion, or introduction of a new type of aircraft.

(b) A relatively large amount of maintenance and/or training done by outside contractors rather than in-house.

(c) Inadequate internal audit procedures to assure self-compliance with safety policies practices, standards, and federal regulations.

(d) Financial, labor-management, or other corporate problems such as rapid turnover of key personnel.

(e) Management skills and philosphy incompatible with sound practices, such as slighting safety for the sake of marketing or financial consideration.

Sample Nomination For Inspection Candidates

From: Manager,_____ FSDO

To: Manager, Safety Analysis Branch

Subject: Nominations For Inspection Candidates

The Following FAA air operator and/or air agency certificate holders qualify as inspection candidates under the Technical Evaluation Program for FY_____:

1. Name Of Certificate Holder:

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Reason For Nomination:

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2. Name Of Certificate Holder:

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Reason For Nomination:

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3. Name Of Certificate Holder:

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Reason For Nomination:

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